

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,

INDICTMENT CR 20-181 PJS/BRT

Plaintiff,

18 U.S.C. § 371

18 U.S.C. § 844(i)

v.

DYLAN SHAKESPEARE ROBINSON,
DAVON DE-ANDRE TURNER,
BRYCE MICHAEL WILLIAMS, and
BRANDEN MICHAEL WOLFE,

Defendants.

THE UNITED STATES GRAND JURY CHARGES THAT:

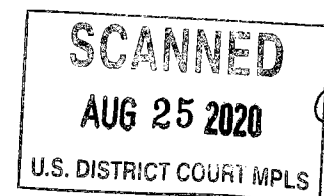
COUNT 1

(Conspiracy To Commit Arson)

1. On or about May 28, 2020, in the State and District of Minnesota, the
defendants,

DYLAN SHAKESPEARE ROBINSON,
DAVON DE-ANDRE TURNER,
BRYCE MICHAEL WILLIAMS, and
BRANDEN MICHAEL WOLFE,

knowingly and intentionally conspired with each other and others known and
unknown to the grand jury to damage and destroy, and attempt to damage and
destroy, by means of fire, a building used in interstate and foreign commerce and in
activity affecting interstate and foreign commerce, in violation of Title 18, United
States Code, Section 844(i), all in violation of Title 18, United States Code, Section
371.



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PURPOSE OF THE CONSPIRACY

2. The purpose of the conspiracy was to commit an act of arson at the Minneapolis Police Third Precinct building located in the city of Minneapolis, in the District of Minnesota.

MANNER AND MEANS

3. It was part of the conspiracy that on May 28, 2020, the defendants Robinson, Turner, Williams and Wolfe, joined each other, and other co-conspirators who had gathered near the Minneapolis Police Department Third Precinct building in the city of Minneapolis, in the District of Minnesota and thereafter set, attempted to set, and agreed to set, fires in the Third Precinct building in the District of Minnesota.

OVERT ACTS

4. In furtherance of the conspiracy and to achieve its object, the defendants committed, directly and through co-conspirators, certain overt acts, including but not limited to the following:

a. On May 28, 2020, Robinson, Turner, Williams and Wolfe all went to the Third Precinct building where hundreds of others had gathered. The crowd became increasingly unruly as the night of May 28, 2020 wore on. At one point, the crowd began shouting, "Burn it down, burn it down," referring to the Minneapolis Police Third Precinct building. Soon after, a fence that was designed to keep trespassers out of the Third Precinct building was torn down. Robinson, Turner, Williams and Wolfe,

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along with unidentified others, breached the fence and entered the Third Precinct Building and the immediate curtilage.

b. Robinson, assisted by an unidentified co-conspirator, lit an incendiary device being held by the unidentified co-conspirator and threw it toward the Third Precinct building with the intent that it would start a fire or fuel an existing fire.

c. Williams and Turner, assisted by an unidentified co-conspirator, worked together to light a Molotov cocktail which they intended to be used to start or further accelerate a fire. The Molotov cocktail was taken into the Third Precinct building by Turner and was used to start a fire. Williams later threw a box on an existing fire located just outside the Third Precinct building entry doors.

d. Wolfe pushed a barrel into a fire located in the entrance of the Third Precinct building that had been set by other unidentified co-conspirators, and he did so with the intent to accelerate the existing fire.

e. Robinson, Turner, Williams and Wolfe and other unidentified co-conspirators all worked together in furtherance of their common goal of damaging and destroying the Minneapolis Third Precinct building by fire in violation of Title 18, United States Code Section 844(i).

All in violation of Title 18, United States Code, Section 371.

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON